

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

December 20, 2019

David J. Bradley, Clerk of Court

United States of America
v.
Carlos Alan FLORES-CAMPOS

Case No. **4:19mj2388**

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 12/19/2019 in the county of Harris in the Southern District of Texas, the defendant violated 8 U. S. C. § 1324(a)(1)(A)(ii) and (v)(1)
1324(a)(1)(B)(i), an offense described as follows:

Conspiring with others knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law, for the purpose of commercial advantage or private financial gain.

This criminal complaint is based on these facts:

See attached Affidavit in support of the Criminal Complaint

☒ Continued on the attached sheet.


Complainant's signature

Randell Southland, Special Agent
Printed name and title

Sworn to me telephonically.

Date: 12/20/2019


Judge's signature

City and state: Houston, Texas

, US Magistrate Judge
Printed name and title

Complaint for 12/19/2019 Event

AFFIDAVIT

I, Special Agent (SA) Randell Southland, am employed by the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations, (HSI) since 2004. Prior to that I was employed by the Immigration and Naturalization Service (INS) from 1997 to 2004. I have extensive training and experience in alien smuggling investigations.

The information enumerated in the paragraphs below, furnished in support of this affidavit, is derived from my own observations and the observations of other law enforcement officers.

1. On December 19, 2019, at approximately 4:44 p.m., Houston Police Department (HPD) conducted a traffic stop on a white Ford passenger van bearing California license plate 8LXA493 for failure to signal lane change. Homeland Security Investigations (HSI), Houston, TX special agents (SAs) responded to the scene—by Cavalcade Street and Interstate 45 in Houston, TX—and determined that the driver and five passengers were undocumented aliens of various countries. All occupants were placed under arrest and transported to the Montgomery Processing Center (MPC) in Conroe, TX for processing.
2. HSI SAs processed and interviewed all subjects. The driver of the van was identified as Carlos Alan FLORES-CAMPOS (hereinafter identified as FLORES), a citizen of Mexico, illegally present in the United States.
3. The smuggled aliens in the van were identified as: Luis Delby HEREDIA SANTA CRUZ, a citizen of Bolivia; Sindi Dayana RAMOS-AGUILAR, a citizen of Honduras; Gilmer Antonio GONGORA-AVILA, a citizen of Mexico; Vidal SEJAS-ESPINOZA, a citizen of Argentina. A fifth subject was identified as a minor and possible smuggling participant. All subjects were found to be illegally present in the United States.
4. SA Silva and SA Reese advised FLORES of his Miranda Rights via ICE Form 73-02; FLORES signed the form indicating he understood his rights and was willing to make a statement to SAs without a lawyer present. During his interview, FLORES stated that he rented the white Ford van in Los Angeles, CA and has been in Texas since Saturday, December 14, 2019. FLORES stated that the van had to be returned to Los Angeles, CA. He considered dropping the van off in Houston, TX but stated it would cost him too much. The van was rented for a one-week time frame. FLORES stated that this was the only time he had driven people.
5. Sindi Dayana RAMOS-Aguilar, a material witness and citizen of Honduras, provided a post-Miranda statement. RAMOS stated her family paid approximately \$6500 for her to be smuggled into the United States. RAMOS stated she illegally entered the United States on or about October 27, 2019 at or near Hidalgo, Texas. She indicated that she had been staying with a friend in Houston since making her illegal entry. The organization she paid to smuggle her provided transportation, including multiple vehicle transfers into the passenger van she was arrested in. RAMOS indicated her final destination was Los

Angeles, California for which her sister paid an additional \$800. During her interview, RAMOS identified the driver of the van as photo number 4 in a six-pack photo lineup.

6. Luis Deiby HEREDIA-SANTA CRUZ (hereinafter referred to as HEREDIA), a material witness and citizen of Bolivia, provided a post-Miranda statement. HEREDIA stated he agreed to pay \$500.00 US Dollars to be smuggled to the state of Virginia. HEREDIA admitted to having entered the United States illegally approximately seven days prior at an unknown location near Reynosa, Mexico. After his illegal entry, HEREDIA stated he was transported to a house where he spent three days there. HEREDIA was then transported to a second house in Houston, TX. HEREDIA stated that he spent three days in that second house. The morning of December 19, 2019, HEREDIA was picked up by an unknown smuggler in an old vehicle and driven to an ally where he was transferred to the white Ford passenger van. HEREDIA stated that there were four passengers in the van, not including the driver.
7. Based upon the evidence gathered during this investigation, I believe there is probable cause to believe that Carlos Alan FLORES-CAMPOS conspired with others knowingly or in reckless disregard of the fact the an alien has come to, entered, or remains in the United States in violations of law, to transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law, for the purpose of commercial advantage or private financial gain, in violation of 8 U.S.C. Sections 1324(a)(1)(A)(ii) and (v)(I), and 8 U.S.C. Section 1324 (a)(1)(B)(i)

AUSA Michael Day was notified of these facts and agreed to prosecute FLORES for violation of Title 8 USC 1324. Sindi Dayana RAMOS-AGUILAR and Luis Deiby HEREDIA-SANTA CRUZ were held as a Material Witness.



Randell Southland
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me telephonically on this 20th Day of December 2019.



U.S. Magistrate Judge